IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA DANVILLE DIVISION

UNITED STATES OF AMERICA

Criminal Action No. 4:18cr00011

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KEVIN L. TRENT, JR.

MOTION TO MERGE MULTIPLICITOUS § 924(c) COUNTS IN THE INDICTMENT

Comes now the defendant, Kevin L. Trent, Jr., by counsel, before trial as required by Rule 12(b)(3)(B)(ii) of the Federal Rules of Criminal Procedure, and moves the Court to merge counts three and five, counts seven and nine, counts thirteen and fifteen, and counts seventeen and nineteen of the First Superseding Indictment, ECF No. 207, for charging the same offense in more than one count.

Respectfully submitted this 14th day of May, 2019,

KEVIN L. TRENT, JR.

By Counsel

/s/ Aaron L. Cook Counsel for Mr. Trent

/s/ James C. Turk Counsel for Mr. Trent

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to all parties.

/s/ Aaron L. Cook Counsel for the defendant